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June 28, 2016

Honorable Frank Maas
United States Magistrate Judge for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *In re Terrorist Attacks on September 11, 2001*, MDL 03-1570 (GBD) (FM)

Dear Judge Maas,

According to the Court's scheduling order, plaintiffs were to file any motion to compel discovery as to Yasin Kadi by June 30. Over the last month, the PEC has been in contact with Mr. Kadi's counsel, Peter Salerno and Amy Rothstein of Salerno & Rothstein, who advised that their on-going production was taking longer than they expected. Earlier this week Ms. Rothstein indicated that they hoped to complete their production by September 30th. Plaintiffs do not know how many pages will be contained in the production, nor what languages they will be in, and will need sufficient time to review them once they are produced. Both parties agreed that an extension of time is needed.

Accordingly, plaintiffs respectfully request an extension of time in which to file any motion to compel as to Kadi to be made 60 days after the completed production which would be November 30, 2016.

Respectfully submitted,

KREINDLER & KREINDLER LLP

/s/ Andrew J. Maloney III
By: Andrew J. Maloney III

AJM/gm
cc: Peter Salerno
Amy Rothstein